

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF ARKANSAS
EASTERN DIVISION

TED CHANDLER AND
MARTHA CHANDLER

Plaintiffs

vs

NO: 3:12-CV-00104-BRW

JACOBS ENGINEERING GROUP, INC.,
PAUL DAVID PENN, MARK ASHER,
CHARLES P. BRAND, ROBERT
WILCOX, JR., L. TONY SULLIVAN AND
APAC-TENNESSEE

Defendants


AFFIDAVIT OF SCOTT TURNER

I, Scott Turner, certify that I am greater than twenty-one years of age and that I provide the following information under oath based on my own firsthand knowledge. If called to testify at trial, I would testify as follows:

1. I have been retained by APAC-Tennessee, Inc. to offer expert opinions in this case.
2. A copy of my expert report dated February 7, 2014 is attached to this affidavit as Exhibit A. I incorporate by reference my full report that is Exhibit A into this paragraph of my affidavit as if it was set forth verbatim herein.
3. A copy of the rebuttal expert report that I authored to respond to the opinions expressed by Ernst Peters, which is dated March 11, 2014 is attached to this affidavit as Exhibit B. I incorporate by reference the full report that is exhibit B into this paragraph of my affidavit as if it was set forth verbatim herein.

VERIFICATION

Pursuant to 28 U.S.C. Section 1746, I, Scott Turner, declare under penalty of perjury that the foregoing is true and correct. Executed on this the 21 day of April, 2014.



Scott Turner